

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

UNITED STATES, *et al.*,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

Civil Action No. 1:23-cv-00108-LMB-JFA

DECLARATION OF LANCE KNOBEL

I, Lance Knobel, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I am the CEO of Cityside Journalism Initiative (“Cityside”), a nonpartisan, nonprofit journalism organization in the Bay Area, covering news in the Berkeley, Oakland, and Richmond communities. I have been CEO since I co-founded Cityside in October 2019.

Cityside is one of the largest non-profit organizations in local journalism.

2. Prior to Cityside, I co-founded Berkeleyside, the leading news source for Berkeley, CA, and a pioneer in online news. Berkeleyside is now published by Cityside.

3. The contents of this declaration are true and correct to the best of my knowledge, information, and belief, and are based on my personal knowledge. If called upon as a witness in this action, I could and would testify competently thereto.

4. In July 2025, I was contacted by and spoke with lawyers from the Department of Justice about the remedies in this case. During those discussions, I voiced the same concerns that are the subject of this declaration.

5. Cityside earns about \$800,000 annually through the sale of display ads on its websites and newsletters. Google Ad Manager (“GAM”) is the only ad server Cityside uses, and it is used to serve all of our website advertising. Cityside uses GAM because it is free to use and performs well, which is critical for a local news organization like Cityside. By contrast, Cityside has found that other ad servers on the market charge fees that are expensive for a company like Cityside.

6. If Google is required to divest GAM’s ad server, as required in Plaintiffs’ Proposed Final Judgment, I am concerned that a buyer will begin charging to use GAM’s ad server consistent with what other ad servers on the market charge. I am also worried about service disruptions during a divestiture of GAM and possible performance declines as a result of a divestiture of GAM, which would be harmful for Cityside given its reliance on GAM and the revenue that Cityside generates through ad sales.

7. Although I work in Oakland, California and reside in Berkeley, California, I am prepared to travel to Virginia to testify because of the significant impact that the remedies decided in this case will have on Cityside’s business.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on September 21, 2025 in Berkeley, California.



Lance Knobel